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UNITED STATES DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON, TACOMA	DIVISION

CARLI CAMPBELL,

Plaintiff,

VS.

NORTHWEST SPEED SKATING CLUB, USA ROLLER SPORTS, UNITED STATES OLYMPIC & PARALYMPIC COMMITTEE, and DEPARTMENT OF SOCIAL AND HEALTH SERVICES,

Defendants.

Case No. 3:22-cv-05953-BHS

Assigned for all purposes to: Honorable Benjamin H. Settle

JOINT STIPULATION AND REQUEST TO DISMISS THE UNITED STATES OLYMPIC & PARALYMPIC COMMITTEE AND REMAND; ORDER OF DISMISSAL AND REMAND

## **STIPULATION**

Plaintiff Carli Campbell and Defendant United States Olympic & Paralympic Committee ("USOPC"), by and through their counsel, hereby enter into the following stipulation:

- 1. Plaintiff Carli Campbell filed a complaint in the Superior Court for the State of Washington, Clallam County, against the United States Olympic & Paralympic Committee and others. The complaint alleges that Plaintiff was sexually abused by her inline skating team coach John Locke.
- 2. On December 8, 2022, the USOPC filed a notice of removal based on certain provisions in the Ted Stevens Amateur Sports Act, 36 U.S.C. section 220501. The action was then transferred to the Federal District Court, for the Western District of Washington.

1	3. The Parties have conferred about the U.S. Olympic & Paralympics Committee's role at		
2	responsibilities during the timeframe alleged in the complaint. Plaintiff has agreed to dismiss th		
3	USOPC, without prejudice and without costs and attorney's fees to any party. With the USOPC'		
4	dismissal, Plaintiff and the USOPC (collectively "the Parties") agree that federal jurisdiction unde		
5	the Ted Stevens Act has been extinguished. As such, the Parties have also agreed and concurrently		
6	request that the matter be remanded to the Superior Court of Washington, in and for the Count		
7	Clallam.		
8			
9	Dated: January 26, 2023	TAYLOR   ANDERSON, LLP	
10			
11		By: s/Zachary D. Rutman Zachary D. Rutman, WSBA #52445	
12		Taylor   Anderson, LLP 3000 El Camino Real, Building 4,	
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15		Attorneys for Defendant United States Olympic &	
16		Paralympic Committee	
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18			
19	Dated: January 26, 2023	ALBERT LAW PLLC	
20		BY: s/Gregory W. Albert	
21		Gregory W. Albert, WSBA #42673 Jonah L. Ohm Campbell, WSBA #55701	
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<u>ORDER</u>

**BEFORE THE COURT**, is the Parties' stipulation to dismiss Defendant United States Olympic & Paralympic Committee and Remand. The Parties stipulate that the USOPC be dismissed, without prejudice and without costs and attorney's fees to any party. The Court has reviewed the record and files herein and is fully informed.

## **ACCORDINGLY, IT IS HEREBY ORDERED:**

- The Parties' Stipulation to Dismiss Defendant United States Olympic & Paralympic Committee and Remand is GRANTED.
- 2. Defendant USOPC is hereby **DISMISSED**, without prejudice, and without costs or attorney's fees to any party.
- 3. Based on the stipulation of the Parties and the record, it is hereby **ORDERED** that the above-captioned case be remanded from the United States District Court for the Western District of Washington to the Superior Court of Washington, in and for the County of Clallam.
- 4. The District Court Executive is directed to enter this Order and Judgment accordingly, furnish copies to counsel and **CLOSE** the file.

DONE IN OPEN COURT this 26th day of January, 2023.

BENJAMIN H. SETTLE United States District Judge

Presented by:

TAYLOR | ANDERSON LLP

By: s/Zachary D. Rutman

Zachary D. Rutman, WSBA# 52445 Attorneys for Specially Appearing Defendant UNITED STATES OLYMPIC & PARALYMPIC COMMITTEE

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## **CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Dated: January 26, 2023 TAYLOR | ANDERSON, LLP

By: s/Zachary D. Rutman

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